

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DWAYNE HASKINS, SR., TAMARA
HASKINS, TAMIA HASKINS, AND
HASKINS FAMILY FOUNDATION INC., :

Plaintiffs, :

v. :

KALABRYA HASKINS, :

Defendant. :

Civil Action No.: _____

Electronically Filed

DECLARATION OF TAMIA HASKINS

I, Tamia Haskins, am over the age of 18 years old and, upon personal knowledge, declares as follows:

BACKGROUND

1. I am the surviving sister of the deceased, former professional football player, Dwayne Haskins, Jr. (hereinafter, "Dwayne, Jr."). Dwayne, Jr. played quarterback in the NFL for three seasons, including as a first round draft pick for the Washington Redskins from 2019-2020, and then for the Pittsburgh Steelers from 2021-2022.

2. The Haskins Family is a very close-knit family. The family gave Dwayne, Jr. the nickname "Simba" when he was a child, taken from the protagonist young lion in the film, "The Lion King."

3. Having grown up in a very spiritual family in Highland Park, New Jersey, and Gaithersburg, Maryland, Dwayne, Jr. was a devout Christian and often expressed the importance of his faith as being a major part of his athletic success.

4. On April 9, 2022, en route to traveling back home to the Pittsburgh, Pennsylvania area from South Florida, where he was training with several of his Pittsburgh Steelers teammates, Dwayne, Jr. was struck and killed by a truck on Interstate 595 near Ft. Lauderdale, Florida. He was 24 years old at the time of his death.

5. Unbeknownst to our family, Dwayne, Jr. and Defendant, Kalabrya Haskins, were married on March 19, 2021, which was a little more than a year prior to his death in April 2022. My parents had never met the Defendant before she married Dwayne, Jr. We do know that she was not in his life prior to 2020.

6. Ever since the tragic death of Dwayne, Jr., our family has experienced constant harassment from the Defendant whenever we have attempted to reference Dwayne, Jr.'s name, image and likeness in public forums such as social media. For instance, the Defendant has contacted Instagram to have my father's account and my account disabled, as recently as May 2024.

7. Because the decision by Instagram to disable both accounts was clearly erroneous, our family is in the process of waging formal challenges to Instagram.

8. In addition, the Defendant has challenged The Haskins Family's establishment of a non-profit foundation that goes by the name, Haskins Family Foundation Inc. Moreover, Defendant has contacted Instagram requesting that the Haskins Family Foundation Inc.'s Instagram account be disabled.

9. I was very close to my big brother and only sibling. As such, on Dwayne, Jr.'s 27th birthday – May 3, 2024 – I posted a photograph of him, along with a portion of a letter that he wrote to our family in 2021, entitled “Who I want to be.” My post stated as follows:

Today, May 3, Dwayne would have been 27 years old. To celebrate his birthday, I wanted to create a piece to honor him. In the last year of his life, Dwayne wrote a letter titled, “Who I want to be” and shared it with me. It's an honor to share how Dwayne saw himself. Dwayne wrote, “So the man that I am now, he's accountable, he's god-fearing, he's hard-working, he's a competitive freak, a loving son, a goofy brother, a caring friend, and a compassionate partner.” The quote is how he wants to be remembered. “Who I want to be” is just a small token of appreciation for the light Dwayne was not only in my life but everyone's. . . . Happy Birthday, Bud; you will always be my Goofy Brother. I love you for eternity.

I also posted an image of custom football leather, my favorite photo of my brother, and my handwriting and the handwriting of my mother. The disabling of my Instagram account has adversely affected my livelihood as my clients have been unable to reach me or to see my work, and I no longer have access to the past direct messages (DMs) that I shared with Dwayne, Jr. or any private social interactions that we enjoyed on Instagram through the years; this has exacerbated

the level of emotional distress and pain that I have suffered.

10. In light of these consistent acts of harassment by the Defendant, the Haskins Family, through our legal counsel, has contacted counsel for the Defendant by letter, dated June 6, 2024. The letter stated, in part:

It has come to our attention that your client, Kalabrya Haskins, has taken certain actions since the death of Dwayne Haskins, Jr. in April 2022 that have been intended to, and have had the effect of, undermining the rights of the Haskins Family to publicly reference the name, image and likeness of their beloved son and brother. We have received evidence that such actions have included, but are not limited to, improperly challenging the existence of the Haskins Family Foundation Inc., as well as formally requesting the disablement of the Instagram social media accounts of Dwayne Haskins, Sr., Tamia Haskins, and the Haskins Family Foundation Inc.

By this letter, and on behalf of the Haskins Family, we are demanding that you immediately cease and desist such improper conduct. We furthermore require that you provide us with written assurances by no later than Monday, June 10, 2024, that your client will no longer pursue the referenced actions or any other such actions. You may provide the written assurances by return email.

11. As of the date of this filing, Defendant's counsel has not provided the assurances requested by our counsel in the above-referenced letter.

12. **(THIS PARAGRAPH IS SUBJECT TO THE PLAINTIFFS' ACCOMPANYING MOTION FOR *IN CAMERA* REVIEW BY THE JUDGE AND THUS SHOULD NOT BE SEEN BY DEFENDANT OR HER COUNSEL, OR OTHERWISE EXPOSED TO THE PUBLIC.)** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONDUCT BY KALABRYA HASKINS

13. The Defendant has engaged in dishonest, aggressive and untrustworthy conduct that requires that our family request that the Court review our planned Project *in camera* and not share it with the Defendant or her counsel.

This conduct has included the following:

- To this day, she refuses to provide an accurate accounting of Dwayne, Jr.'s assets that should be a part of the Estate.
- She has liquidated much of Dwayne, Jr.'s assets that should have been a part of the Estate.
- As the executor of Dwayne, Jr.'s estate, she failed to inform our family that Dwayne, Jr. made me the beneficiary of the Bradley Street Trust, which was his homestead at his death.
- She attempted to steal a very nice painting of Dwayne, Jr., which was created by a professional artist, and was displayed at his Bullis School Memorial Service and personalized with a note to his family; when she was told by the security guard who witnessed the attempted theft that she could not take the painting because it was specifically for Dwayne, Jr.'s family, she responded: "I hope they are going to get a lawyer because they're not going to get any money from us." (Declaration of Tyre Spinner, Ex. 1 to this Declaration, ¶ 2.)
- She has published at least one YouTube video in which she uses the image and likeness of Dwayne, Jr. to receive financial proceeds from the public without placing the proceeds into Dwayne, Jr.'s Estate.
- She attempted to prevent Dwayne, Jr.'s family from getting a copy of their Marriage Certificate and Dwayne, Jr.'s Death Certificate.
- She promised to provide Dwayne, Jr.'s family with a portion of his ashes after she cremated him, without letting us know she had

planned to take this act, but she did not provide us with any portion of his ashes.

- She committed at least one physical assault against Dwayne, Jr. during their marriage.
- She issued a public threat to an NBA basketball player who was involved in an altercation with her sister.

I declare under penalty of perjury under the law of the Commonwealth of Pennsylvania that the foregoing is true and correct.

Signed on the 1st day of July, 2024

Montgomery County, Maryland

United States of America

Tamia Haskins

Tamia Haskins